

Annual 64.2009(e) CPNI Certification for: Calendar Year 2007  
Date Filed: February 29, 2008  
**Name of Company covered by this certification:** Startec Global Operating Company  
Form 499 Filer ID: 826780  
Name of Signatory: Robert Felgar  
Title of Signatory: General Counsel

I, Robert Felgar, certify and state that:

1. I am the General Counsel of Startec Global Operating Company ("Startec") and have personal knowledge of the Startec operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Startec operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section §64.2001 *et seq.* of the Commission's rules..



Robert Felgar, General Counsel  
Startec Global Operating Company

2/29/08

Date

Attachment A  
Statement of CPNI Procedures and Compliance

**Startec Global Operating Company**

Calendar Year 2007

## **Startec Global Operating Company**

### **STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

**Startec Global Operating Company**, ("Startec" or "Company") provides presubscribed and casual calling (dial around) long distance services to residential and business customers. The Company provides the following as its Statement of CPNI compliance.

The Company uses CPNI, upon occasion, to market services to its customers and notifies its customers of their right to restrict use of, disclosure, and access to their CPNI, prior to asking for approval to use CPNI. Customer approval is obtained using opt-out approval and the Company establishes and maintains records establishing that notice was provided and approval was obtained. The Company maintains a record of all sales and marketing campaigns that use CPNI.

Startec utilizes both direct billing and LEC billing and has taken steps to secure CPNI and manage its release in accordance with FCC rules. The company has put into place processes to safeguard its customers' CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to CPNI.

User account information can only be accessed by authorized representatives of the company. Such authorized representatives have access to customer records management systems only via an established password protected account set-up in their name by a system administrator. When the Company agent accesses customer information of any type, an audit log is created on the account that indicates the company agent that accessed the records.

Every employee that has access to CPNI is trained by the Company. All customer service personnel go through special CPNI training and must take and pass a test to ensure that they understand the policy. The marketing department has likewise been trained by the legal department regarding when and how they may use CPNI.

Call detail information is provided over the telephone to customers. An account Password is created at the time the customer account is established and provided to the Customer as part of the welcome package. This Password is generally used by customers to access their account information on line. The customer, may, however, access his or her CPNI by calling a customer service representative, if the customer provides the password to the representative. If the customer cannot provide the password, and the customer's request does not fall into the exception where the call detail information is provided by the customer to the Customer Service Representative, then call detail will only be provided to the customer

by mail to the customer's address of record, or by calling the customer back at the telephone number of record. Note that if the customer forgets or loses his or her Password, Startec will generate a new password at the customer's request. The Password will be sent to the customer's email address of record.

The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

Although Startec is not yet subject to the on-line requirement the company has already implemented an on-line password protection system and is in full compliance with the authentication procedures to safeguard the disclosure of CPNI.

The Company does not have retail locations and therefore does not disclose CPNI in-store.

The Company notifies customers via its IVR system, of the following account changes (without revealing the changed information or sending the notification to the new account information): password change, change to an on-line account, change or creation of an address of record other than at service initiation.

The Company has not taken any actions against data brokers in the last year.

The Company does have procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach. The company maintains a record of any breaches discovered and notifications made to the USSS and FBI. The customer's electronic record is updated with information regarding notifications on CPNI breaches.

The Company has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.